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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

HR STAFFING CONSULTANTS, LLC and
UPSTREAM HEALTHCARE MANAGEMENT
OF NEW JERSEY, LLC,

Plaintiffs,

v.

RICHARD BUTTS,

Defendant.

CIVIL ACTION

DOCKET NO. 2:15-cv-03155-KM-SCM

**ORDER TO SHOW CAUSE
WITH TEMPORARY RESTRAINTS**

THIS MATTER having been opened to the Court by Plaintiffs HR Staffing Consultants, LLC and Upstream Healthcare Management of New Jersey, LLC (“Plaintiffs”), through their counsel Epstein Becker & Green, P.C. (Anthony Argiropoulos, Esquire appearing), by way of a Motion for a Temporary Restraining Order seeking an Order to Show Cause with Temporary Restraints against Defendant Richard Butts (“Defendant”); and it appearing to the Court that Plaintiffs have served copies of their Brief, the Complaint, and all supporting papers upon Defendant; and the Court having considered the supporting papers; and other good cause having been shown:

It is on this ____ day of _____, 2015, HEREBY ORDERED AS FOLLOWS:

1. Pending further Order of the Court, Defendant Richard Butts shall be restrained from:

A. Violating the non-compete and non-solicitation provisions of his Employment Agreement with HR Staffing, including, but not limited to, being employed by CarePoint Health Management Associates, LLC, and/or any of its related entities (collectively, “CarePoint”); and,

B. Violating the confidentiality provisions of his Employment Agreement with HR Staffing, including, but not limited to, disclosing to CarePoint any confidential or proprietary information, or trade secrets of Plaintiffs.

It is further ORDERED that:

1. Defendant shall appear and show cause why an Order should not be issued converting the Temporary Restraints set forth above into a preliminary injunction as follows:

2. Defendant shall appear for a deposition on the ____ day of _____, 2015, at 10:00 am, at the offices of Epstein Becker & Green, P.C., One Gateway Center, Newark, NJ 07012, and at that time shall produce all documents in his possession, custody, or control evidencing communications between himself and CarePoint regarding: (1) his employment or potential employment by CarePoint; (2) any attempts by himself or CarePoint to solicit and/or recruit other employees of Plaintiffs; and (3) any disclosures to CarePoint of any confidential or proprietary information, or trade secrets of Plaintiffs, including, but not limited to, operations, business plans, and internal communications between and among Richard Butts, Christopher Howard, and Paul Ingledue.

3. Defendant shall file and serve a written response to this Order to Show Cause with proof of service upon Plaintiffs by the ____ day of _____, 2015.

4. Plaintiffs shall file and serve a written reply to Defendant's response with proof of service by ____ day of _____, 2015.

It is so Ordered.

By the Court:
